

RE: FYI: Insight Threat Intelligence financing background on the protests

From: "Ryan, Annette (FINTRAC/CANAFE)" <annette.ryan@fintrac-canafe.gc.ca>
To: s.38 (FINTRAC/CANAFE)" s.38 @fintrac-canafe.gc.ca>
Date: Mon, 07 Feb 2022 22:42:42 +0000

Thanks, s.38

Let's pass this to Darren as a series of factual reports that he can disseminate through clips. Let's think of the summary document for our discussion with Karyne on Wednesday, so we could send to her with questions we would like to clarify, eg after today's discussion I have been thinking there is an important distinction as to what constitutes suspicion of terrorism vs proof as the basis for an STR.

Sent from my Bell Samsung device over Canada's largest network.

----- Original message -----

From: s.38 (FINTRAC/CANAFE)" s.38 @fintrac-canafe.gc.ca>

Date: 2022-02-07 5:32 p.m. (GMT-05:00)

To: "Ryan, Annette (FINTRAC/CANAFE)" <Annette.Ryan@fintrac-canafe.gc.ca>

Subject: RE: FYI: Insight Threat Intelligence financing background on the protests

I expect there may be a future podcast updating the financing issue, as the previous one was pre-GFM shutting down the campaign (they are carrying this language "This podcast was recorded before the news that GoFundMe shut down payments to the Convoy organizers. As noted in the podcast, organizers have other options to raise funds. We'll look to update listeners on these developments sometimes next week."). When it drops, I'll be quick to pass it along to Darren with the appropriate text.

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I will re-send the summary below, as well include a link to the substack to make it clear what is being reported as well as remove the bullets on the public-facing information (though it does note that Jessica observes that the payment processors would have access to that information). Consider it forthcoming.

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s.38

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From: Ryan, Annette (FINTRAC/CANAFE) <Annette.Ryan@fintrac-canafe.gc.ca>

Sent: February 7, 2022 4:47 PM

To: s.38 (FINTRAC/CANAFE) s.38 @fintrac-canafe.gc.ca>

Subject: RE: FYI: Insight Threat Intelligence financing background on the protests

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I am thinking to pass this along to Darren for the clips so was thinking this was more literal to the podcast. If it is more general, I won't ask for changes from that margin, but rather want to cite it correctly.

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I do have one small editorial comment.

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As you saw today, Barry is likely to seize on the public anonymity as not actually being anonymous donations to the PSPs and REs, so would be good to not overplay the anonymous public donor aspect of it is the case that KYC is being provided with transactions. Can you review?

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From: s.38 (FINTRAC/CANAFE) s.38 @fintrac-canafe.gc.ca>

Sent: February 7, 2022 4:42 PM

To: Ryan, Annette (FINTRAC/CANAFE) <Annette.Ryan@fintrac-canafe.gc.ca>

Subject: RE: FYI: Insight Threat Intelligence financing background on the protests

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These are key points from her articles on the convoy—we have a subscription to her Insight Threat Intelligence substack ([Insight Intelligence | Jessica Davis | Substack](#)) and I asked for the key points from those. Sorry, did you just want the information from her podcast appearance?

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MJ
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From: Ryan, Annette (FINTRAC/CANAFE) <Annette.Ryan@fintrac-canafe.gc.ca>
Sent: February 7, 2022 4:37 PM
To: s.38 (FINTRAC/CANAFE) <s.38@fintrac-canafe.gc.ca>
Subject: RE: FYI: Insight Threat Intelligence financing background on the protests

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Thanks. Is this a direct summary of the podcast? Or are any points editorial beyond the podcast?
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From: s.38 (FINTRAC/CANAFE) <s.38@fintrac-canafe.gc.ca>
Sent: February 7, 2022 4:19 PM
To: Ryan, Annette (FINTRAC/CANAFE) <Annette.Ryan@fintrac-canafe.gc.ca>
Cc: s.38 <s.38@fintrac-canafe.gc.ca>; s.38 (FINTRAC/CANAFE) <s.38@fintrac-canafe.gc.ca>; Bennett, Patricia (FINTRAC/CANAFE) <Patricia.Bennett@fintrac-canafe.gc.ca>; s.38 (FINTRAC/CANAFE) <s.38@fintrac-canafe.gc.ca>
Subject: FYI: Insight Threat Intelligence financing background on the protests

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Good afternoon Annette,
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My team, as part of our efforts to regularly monitoring of emerging trends and developments in the area of money laundering and the financing of terrorist activities, have gathered some of the key relevant points from Jessica Davis' analysis on the financing of the Ottawa protests. Jessica Davis is a former FINTRAC employee and is the President and principal consultant at Insight Threat Intelligence. We are providing it as additional background / context:

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Crowdfunding

- \~ On February 4th, 2022, **GoFundMe** cancelled the fundraiser and is issuing refunds, citing breaches to its terms of service - specifically section 8 from their terms of service, "which prohibits the promotion of violence and harassment".
 - o\~ GFM previously released \$1 million on Jan. 27, 2022, to the campaign's bulk fuel supplier.
 - o\~ Of note, no identity verification available through publically-available information on donors, although GFM and its payment processors (Paypal, Stripe, etc.) have this information through financial transaction information
- \~ With the cancellation of the main GFM campaign, the organizers established a separate **GiveSendGo** campaign and it has since raised over \$4 million dollars, with a final goal of \$16 million.
 - o\~ For context, GiveSendGo is a Christian crowdfunding site that was implicated in financing for the January 6th insurrection at the US Capitol.
 - o\~ Similar to the GFM campaign, this crowdfunding campaign includes donations from anonymous donors, and no identity verification for the public-facing names of donors.
- \~ The GiveSendGo campaign indicates that funds will be dispersed to **a registered not-for-profit corporation, Freedom 2022 Human Rights and Freedoms.**

- o\~ The purpose of the organization is listed in its articles of incorporation: Advocacy against government, agents of government and any other organization person or individuals' actions, laws, policies and practices that violate human rights and freedoms paying special attention to creation of class systems through mandates, social credit systems (rewards and punishments for government compliance), passport systems and more.
- o\~ Not-for-profits do not issue tax receipts like charities can, are subject to less scrutiny, as well as separating individual liability from the activities of the corporation
- o\~ None of the main organizers of the convoy and crowdfunding campaigns are listed as directors for the corporation.

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Bitcoin and Crypto crowdfunding

- \~ An organizer of the convoy and GFM previously commented that the convoy might need to raise money using Bitcoin, possibly in response to the review & freeze of GFM.
- \~ As of yet, two Bitcoin fundraisers appear to have been established for the protest, although the relationship to the protest organizers and whether funds have been dispersed to them remains unclear. The current combined value of the wallets is approximately US\$30,000

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Direct donations

- \~ Organizers have solicited direct donations through EMTs to the address tbofconvoy2022@protonmail.com, which is likely a source of funds for the protest considering direct donations to the protest organizers would allow for immediate disbursement of funds for food, fuel, and lodging, but would also open them up to additional scrutiny by their banks

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Assessments

Over her articles examining the financing of the convoy at Insight Threat Intelligence, she has concluded that:

- \~ The difference between organizational and operational financing is increasingly becoming visible in the context of the convoy, with the large crowdfunding campaigns appearing to largely be propaganda instruments at the moment, meant to galvanize crowds and supporters.
 - o\~ Operationally, in terms of direct convoy support, funds seem to be coming from other sources. She suspect that much of these funds are coming in the way of direct donations to the main organizers through the email addresses being shared online.
- \~ The establishment of the not-for-profit corporation is consistent with the messaging that an iteration of the protest will continue into spring and summer.
- \~ At the moment, the not for profit appears to have been established as a vehicle for the crowdfunding campaign disbursements and to give the protest the veneer of legitimacy, at least in the eyes of the banking community.

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Strategic Intelligence, Research and Analytics (SIRA) Unit
Financial Transactions and Reports Analysis Centre of Canada

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